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FEDERAL COMMUNICATIONS COMMISSION
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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)
)
Amendment to the Commission's)
Regulatory Policies Governing)
Domestic Fixed Satellites and)
Separate International Satellite Systems)

IB Docket No. 95-41

To: The Commission

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REPLY COMMENTS OF IT&E OVERSEAS, INC.

IT&E Overseas, Inc. ("IT&E"), an international and domestic interexchange carrier operating under authority of the Federal Communications Commission ("FCC" or "Commission"), by its attorneys and pursuant to Section 1.415 of the Rules and Regulations of the FCC, 47 C.F.R. § 1.415, respectfully submits the following reply comments in response to the Commission's Notice of Proposed Rulemaking ("NPRM") in the above-captioned proceeding.¹ In the NPRM, the Commission proposes to eliminate the distinction between its Transborder Policy and Separate International Satellite Systems Policy. Under the Commission's proposed approach, all U.S.-licensed geostationary fixed satellites would be treated under a single regulatory scheme.

IT&E, which is based in Guam, supports the FCC's proposal to permit all U.S.-licensed satellites to provide both domestic and international services. Guam is a territory of the United States which is considered domestic for telecommunications purposes.² Due to Guam's distance and isolation, the island has been and continues to be inadequately served

¹ Amendment to the Commission's Regulatory Policies Governing Domestic Fixed Satellites and Separate International Satellite Systems, Notice of Proposed Rulemaking, FCC 95-146 (released April 25, 1995).

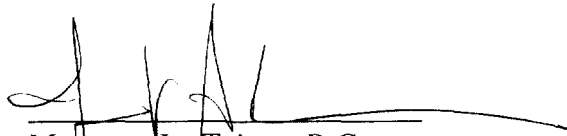
² See IT&E Overseas, Inc. and PCI Communications, Inc., 7 FCC Rcd 4023 (1992).

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by competitive satellite service providers. IT&E believes that eliminating the arbitrary distinction that currently exists between international and domestic satellite services will serve the public interest by stimulating the provision of satellite services to more remote United States locations, including the far western Pacific Ocean Region, where Guam is located. In addition, this action will increase competition between satellite service providers and terrestrial service providers in these same remote regions. The benefits of this increased competition, such as greater choice and lower prices, will ultimately benefit consumers. Accordingly, IT&E supports the proposals set forth in the NPRM.

Respectfully submitted,



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June 23, 1995

CERTIFICATE OF SERVICE

I, Eileen O'Hara, an employee of Akin, Gump, Strauss, Hauer & Feld, L.L.P.,
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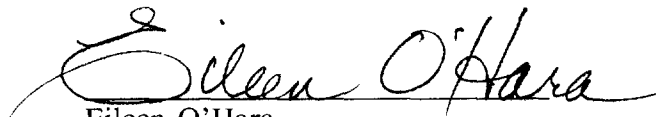
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